



Indiana Department of Education

SUPPORTING STUDENT SUCCESS

Office of Title I Academic Support
151 West Ohio Street – Indianapolis, IN 46204

April 11, 2008

Dr. Vincent Bertram, Superintendent
Evansville-Vanderburgh School Corporation #7995
1 Southeast Ninth Street
Evansville, Indiana 47708-1821

Dear Dr. Bertram

On February 11th and March 3, 2008, the Indiana Department of Education's monitoring team commenced an on-site monitoring review of the Evansville-Vanderburgh School Corporation's (EVSC) administration of Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the *No Child Left Behind Act* (NCLB). Enclosed is a report based upon this review.

Prior to, during, and following the on-site monitoring review, the IDOE team conducted a number of activities (described in the attached report) to verify compliance with 1) the programmatic requirements of Title I, Part A; and 2) the fiscal requirements that must be followed by recipients of Title I, Part A educational funds.

The enclosed report summarizes the results of our on-site monitoring review. **Within 30 business days of the date of this letter**, please submit a response, and where appropriate, further documentation. IDOE will review the documentation and determine if it is sufficient to remove or remedy identified compliance problems.

In all cases where there are findings of non-compliance, **EVSC is responsible for taking appropriate action to remedy compliance deficiencies**. In some instances this can occur immediately and in some instances a longer term solution may be necessary. Where longer term measures are necessary, EVSC must submit a specific detailed action plan with timelines and benchmarks for corrective action. IDOE will be happy to provide technical assistance to EVSC where appropriate.

The IDOE team would like to thank you, Pat Melton, Paul Smith and other staff for their work and assistance provided prior to and during the review in gathering materials and providing access to information in a timely manner.

Sincerely,

Lee Ann Kwiatkowski, Director
Office of Title I Academic Support

cc: Pat Melton, Chief Academic Officer
Paul Smith, Title I Program Supervisor
Linda Miller, Assistant Superintendent of Center for School and Student
Academic Support

**Indiana Department of Education
Title I, Part A Monitoring**

District: EVSC School Corporation

Monitoring Date: February 11 and March 3, 2008

Monitoring Team: Lee Ann Kwiatkowski, Hazel Beasley, Cindy Hurst, Linda Ricketts, Laura Cope, Brenda Martz, and Bill Luther

Background Information

The Indiana Department of Education (IDOE) commenced on-site monitoring of the EVSC School Corporation on February 11 and March 3, 2008. The purpose of this monitoring visit was to identify areas of strength, areas that need improvement, and areas of non-compliance with Title I, Part A and federal grants management (fiscal) requirements.

IDOE specifically monitored in the following areas:

Monitoring Topic	Statutory Citation
1) Compliance with professional qualification requirements for teachers and paraprofessionals	NCLB §1111(h)(6(A) NCLB §1119(c)(1) NCLB §9101(23)
2) Compliance with parental involvement requirements	NCLB §1118(a)-(h) NCLB §1111(c)(14) NCLB §1111(d) NCLB §1116(a)(1)(D) NCLB §9101(32)
3) Compliance with school improvement requirements	NCLB §1116(b) NCLB §1116(c) NCLB §1116(e)
4) Compliance with district improvement requirements	NCLB §1116(c)
5) Compliance with schoolwide program requirements	NCLB §1114
6) Compliance with targeted assistance program requirements	NCLB §1115
7) Compliance with school ranking and serving requirements	NCLB §1113
8) Compliance with comparability requirement	NCLB §1120A
9) Compliance with maintenance of effort requirement	NCLB §1120A NCLB §9521
10) Compliance with equitable services to private school	NCLB §1120

students requirements	
11) Compliance with statutory set-aside requirements	NCLB §1113 NCLB §1116 NCLB §1118
12) Compliance with supplement, not supplant requirements	NCLB §1120A
13) Compliance with financial management systems requirements	EDGAR §80.20 EDGAR §80.36
14) Compliance with compensation for personnel services requirements	OMB Circular A-87, Attachment B, Section 8
15) Compliance with complaint procedures	Subpart F- Complaint Procedure (CFR, Title 34)
16) Compliance with equipment requirements	EDGAR §80.32 OMB Circular A-87
17) Compliance with Neglected Institutes	NCLB §1401

During the on-site visit, IDOE spent time interviewing staff from EVSC at their central office. In addition, IDOE visited Culver Elementary school, where interviews were conducted with the principal and the Title I staff. IDOE also interviewed the Principal and the Title I staff from Harwood Middle School at the central office.

IDOE reviewed documents, including district policies and procedures, district notices to parents, district plans, school plans, personnel information, budget documents, contracts, and expenditure reports.

Based on the above information, our report follows.

Monitoring Topic 1: Compliance with NCLB professional qualification requirements for teachers and paraprofessionals

Background

IDOE interviewed the Title I Program Supervisor and Chief Academic Officer. In addition, IDOE reviewed letters to personnel, and notices to parents.

Statutory Requirement: Professional qualifications requirements are contained in Sections 1111 and 1119 of Title I. In addition, "highly qualified" is defined in Section 9101(23) of the general provisions section of NCLB.

Areas of Compliance

Parents' Right to Know: Teacher Qualification: EVSC did ensure that all parents of students in Title I served schools received the Parents' Right to Know notification explaining that they could request information on the qualifications of their children's instructors. An appropriate letter and proof of mailing were provided. Letters were mailed directly from the central office.

Professional qualification requirements for paraprofessionals: EVSC produced evidence demonstrating that all paraprofessionals meet the highly qualified requirements.

5% set-aside: EVSC did not reserve 5% of its allocation to support assisting teachers in reaching the professional qualification requirements. Teachers in Title I schools are highly qualified.

Principal Attestation: EVSC ensures that the principal of every school receiving Title I funds has attested annually, in writing, as to whether the school is in compliance with the professional qualification requirements of NCLB. As part of the annual application review, grant approval is not given unless each principal has signed a template attesting that their school is in compliance with the professional qualification requirements of NCLB.

Parents' Right to Know re: non-highly qualified teacher: EVSC did not have any students taught by a teacher for four or more consecutive weeks during the 2007-2008 school year that was not highly qualified.

Professional qualification requirements: EVSC produced evidence demonstrating that teachers of core academic subject areas meet the highly qualified status required for compliance with NCLB regulations. HOUSSE documentation, Praxis scores, and licensure were reviewed for compliance based on a random sampling of teachers at Culver Elementary. All documentation is kept in EVSC's central office.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 1

None

Monitoring Topic 2: Compliance with parental involvement requirements

Background

IDOE interviewed the Title I Program Supervisor and Chief Academic Officer as well as the principals of two schools. In addition, IDOE reviewed policies and agendas provided at the on-site.

Statutory Requirement: Parental involvement requirements are contained throughout Title I, specifically in Sections 1111, 1116, and 1118. In addition, parental involvement is defined in Section 9101(23) of the general provisions section of NCLB.

Areas of Compliance

LEA Parent Involvement Policy: EVSC was able to provide evidence that it had a district parental involvement policy; the policy contains all of the statutory components as specified in NCLB.

Distribution of Parental Involvement Policies: The LEA and school parental involvement policies were given to parents at registration at the beginning of the school year. Parents at each school signed for the policies.

Annual meeting: Both Culver and Harwood schools held an annual parent meeting. The meeting was announced in a newsletter. Culver's Annual Meeting was scheduled for January 29, 2008. IDOE saw evidence that parents have been made aware of this meeting.

Building schools' and parents' capacity for strong parental involvement: EVSC showed that both Culver Elementary and Harwood Middle School were building parent's capacity in a variety of ways. Culver holds monthly family nights, distributes brochures to incoming kindergarten families, and works to bring outside organizations to partner with families in need. Harwood and Culver work with Parent Involvement coordinator Debra Wilson. Debra has been working with parents to bridge the gap between home and school.

Reviews Effectiveness of Parental Involvement Activities: EVSC provided evidence that there is ongoing review of the effectiveness of their parent involvement activities.

Parent Information Resource Center (PIRC): EVSC provided evidence of PIRC information being sent home through a mailing at the district level and in a newsletter distributed by Debra Wilson, the parent involvement coordinator.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 2

Annual meeting: Both Culver and Harwood schools held an annual parent meeting. The meeting was announced in a newsletter. Culver's Annual Meeting was scheduled for January 29, 2008. IDOE saw evidence that parents have been made aware of this meeting. This meeting needs to be held early in the year.

Recommendation: This meeting needs to be held early in the year.

LEA Parent Involvement Policy: regarding joint development: EVSC was unable to demonstrate that parents were involved in the joint development of the parent involvement policy. When IDOE contacted parents that were listed as participating, those parents stated they were unaware of being involved in the creation of the LEA Parent Involvement Policy.

Required Action: EVSC must submit sign-in sheets from staff and parents that developed this plan and ensure that parents are involved in the creation of parent policies.

School Written Parental Involvement Policy and Compact: EVSC does not have School Parental Involvement Policies that contain all required components. Although schools have parental involvement policies, a thorough review of Culver and Harwood revealed that essential components are missing from both the policies and the compacts. (See Attachments B and C)

Required Action: EVSC must submit School Parental Involvement Policies including compacts for Harwood and Culver to the IDOE. Evidence must be submitted to the IDOE showing the policies were developed with meaningful consultation with parents. Evidence must also be submitted to the IDOE that shows that the policies were distributed to all parents. EVSC must ensure that the Parental Involvement Policies contain the necessary components as stated in Sec. 1118 in order to be in compliance with NCLB requirements. Parental Involvement Policies must be updated with parents annually. All evidence must be submitted to the IDOE by July 28, 2008.

Monitoring Topic 3: Compliance with school improvement, corrective action, restructuring, and alternative governance requirements; including proper implementation of public school choice and Supplemental Educational Services (SES).

Background

IDOE interviewed the Title I Program Supervisor and Chief Academic Officer and principals at Culver and Harwood to discuss school improvement issues.

Statutory Requirement: School improvement, corrective action, restructuring, and alternative governance requirements, including proper implementation of public school choice and supplemental educational services are contained in Section 1116. Depending on the number of years a school has not made adequate yearly progress (AYP), the school, district, and in certain cases state, must take certain actions.

Areas of Compliance

The IDOE was very impressed with the level of support and assistance EVSC is providing to schools that are in improvement. It is exciting to see the formation of this new team to support school in EVSC.

Public School Choice: EVSC provided evidence of mailing letters to parents informing them of improvement status and the option to transfer to another school. The letter was translated and sent to parents of limited English students.

Peer Review of School Improvement Plans: EVSC did provide evidence of a peer review process for Culver and Harwood's improvement plan.

Implementation of school improvement plan: EVSC demonstrated that the district monitors the implementation of school improvement plans.

Implementation of Supplemental Educational Services (SES): EVSC provided evidence that SES was being implemented correctly. The SES coordinator had a detailed database to ensure that only eligible students were receiving SES. This database was used to verify attendance and invoicing.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 3

None.

Monitoring Topic 4: Compliance with District Improvement Requirements

Background

IDOE interviewed the IDOE interviewed the Title I Program Supervisor and Chief Academic Officer and principals at Culver and Harwood to discuss district improvement issues.

Statutory Requirement: School improvement, corrective action, restructuring, and alternative governance requirements, including proper implementation of public school choice and supplemental educational services are contained in Section 1116. Depending on the number of years a school has not made adequate yearly progress (AYP), the school, district, and in certain cases state, must take certain actions.

Statutory Requirement: District (local educational agency) improvement requirements are contained in §1116(c).

Areas of Compliance

Evidence of LEA improvement plan being implemented: As IDOE staff interviewed EVSC staff it was evident by agendas, sign-in sheets and professional development activities that the LEA improvement plan has been implemented in the district.

LEA Improvement Letter: EVSC was able to provide evidence that LEA improvement letters were mailed to all families in the district.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 4

None

Monitoring Topic 5: Compliance with schoolwide program requirements Background

IDOE interviewed the Title I Program Supervisor and Chief Academic Officer and principals at Culver and Harwood regarding schoolwide program requirements. In addition, IDOE visited a schoolwide school and reviewed two schoolwide plans and other documentation.

Statutory Requirement: The schoolwide program requirements are contained in Section 1114. In general, in an eligible schoolwide program school federal, state, and local funds can be combined to upgrade the entire educational program (except Reading First funds). Unlike a targeted assistance school, where certain students must be identified for Title I services, in a schoolwide program school all students are considered to be eligible for services and the goal is to upgrade the entire educational program of the school. In addition, in a schoolwide school, schools are not required to maintain separate fiscal records, by program, that identify activities supported with particular funds as long as the school maintains records that demonstrate that the schoolwide

program, as a whole, addresses the intent and purposes of each Federal program that was consolidated. (See Attachment E)

Areas of Compliance Schoolwide Program Plans: EVSC provided evidence of a schoolwide program plan for Harwood and Culver. The plans were developed, reviewed, and evaluated annually with the input of teachers, district administrative staff, and parents.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 5

Schoolwide Program Plans: Harwood and Culver have schoolwide plans; however, this plan did not contain the ten statutory components required in schoolwide program (SWP) plans. (See Attachment D)

Implementation of Schoolwide Plan: Since Harwood and Culver do not have compliant SWP, implementation of each component is not possible.

Required Action: EVSC must ensure that Harwood and Culver revise their current schoolwide plans. The revised plans must be submitted to the IDOE by July 28, 2008.

Monitoring Topic 6: Compliance with Targeted Assistance Program Requirements

Statutory Requirement: The targeted assistance program requirements are contained in Section 1115. In a targeted assistance school, a school must maintain a list of eligible children who receive Title I services. Eligible children are children identified by the school as failing, or most at risk of failing, to meet the State's challenging student academic achievement standards.

Areas of Compliance

EVSC does not have Targeted Assistance Programs.

Monitoring Topic 7: Compliance with School Ranking and Serving Requirements

Background

IDOE interviewed the Title I Program Supervisor and Chief Academic regarding the Title I ranking and serving requirements.

Statutory Requirement: The ranking and serving requirements are contained in Section 1113.

Areas of Compliance

Ranking and serving: EVSC demonstrated compliance with the statutory requirements for ranking and serving.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 7

None

Monitoring Topic 8: Compliance with Comparability Requirement

Background

IDOE interviewed the Title I Program Supervisor and Chief Academic Officer regarding the Title I comparability requirement. The Comparability Report for 2006-2007 was due on November 15, 2006.

Statutory Requirement: The comparability requirement is contained in Section 1120A.

Areas of Compliance

Comparability: EVSC met compliance with comparability requirements.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 8

None

Monitoring Topic 9: Compliance with Maintenance of Effort

Background

The Indiana Department of Education conducts yearly review of maintenance of effort for all Title I schools.

Statutory Requirement: The maintenance of effort requirements are contained in Section 1120A of Title I and Section 9521 of the general provisions section of NCLB.

Areas of Compliance

EVSC is in compliance with the maintenance of effort requirement.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 9

None

Monitoring Topic 10: Compliance with Equitable Services to Private School Students Requirements

Background

IDOE interviewed the Title I Program Supervisor and Chief Academic Officer regarding compliance with nonpublic requirements. IDOE also visited a nonpublic institution during which the assistant principal and Title I tutor were interviewed.

Statutory Requirements: The equitable services requirements are contained in Section 1120.

Areas of Compliance

Consultation with Non-Public Officials: EVSC was able to provide written documentation that consultation between the district and nonpublic schools begins in the spring as the Title I grant for the following year is being developed and continues throughout the school year.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 10

Student Selection: EVSC did not provide evidence that appropriate criteria were used to identify eligible students for Title I services. Participating students were not ranked in order of greatest need, only students receiving Free and Reduced lunch were being served.

Required Action: EVSC must identify residentially eligible nonpublic school students for Title I services using multiple, educationally related, objective criteria; except that students in preschool through second grade can be identified solely on the basis of teacher or parent input, and developmentally appropriate measures. An assurance must be sent to IDOE stating that appropriate measures will be used by July 28, 2008.

Evaluation of Program: EVSC was not able to provide evidence that an evaluation of nonpublic school programs has been done.

Required Action: EVSC must conduct an annual evaluation of each nonpublic Title I program. A summary of this evaluation must be sent to IDOE by July 28, 2008.

Monitoring Topic 11: Compliance with Statutory Set-aside

Background

IDOE interviewed the Title I Program Supervisor and corporation treasurer regarding the Title I statutory set-aside requirements.

Statutory Requirements: The statutory set-aside requirements are contained throughout Title I, including required reservations for neglected and delinquent children; homeless children, public school choice, supplemental educational services, school improvement, parental involvement and professional development (see Sections 1113, 1116, and 1118).

Areas of Compliance

Homeless students: EVSC set aside \$5,000.00 for homeless in 2006-2007 and expended \$3,624.60. The district relies on surveys to counselors to identify those students that are homeless.

Recommendation: It is recommended by the IDOE that EVSC review the Non-Regulatory Guidance found in Attachment G. This Guidance must be followed by all LEAs and school personnel when expending funds for homeless students.

1 Percent Parental Involvement: EVSC set aside \$63,936.11 (this included carryover from 2005-2006) and the expenditures exceeded the 1%. The district did expend at least 95% of the 1% in the schools.

Choice/SES: EVSC provided open-enrollment and expended the required set-aside.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 11

LEA Improvement: The required set-aside was \$630,242.00 with the actual set-aside being \$486,217.00 at the districtwide level. From the districtwide expenditures and the two schools reviewed (Culver and Harwood); IDOE could not find evidence that the

district expended 10% for the LEA professional development. The total expended \$433,904.03 included districtwide expenses \$237,624.52 + \$13,264.65, districtwide stipends \$98,463.89, Culver travel \$4,215.38, Harwood stipends \$43,307.62, and Cedar Hall stipends \$37,027.97.

Required Action: EVSC must ensure in writing by July 28, 2008 that the 10% LEA improvement set-aside will be set aside and expended during the 2008-2009 school year. In addition, EVSC must carryover funds not spent during 2007-2008. Please refer to Attachment E taken from the Fiscal Handbook for more information on set-asides.

10% Set-Aside for Schools in Improvement: Harwood set aside \$32,000.00 for professional development in 2006-2007 and expended \$43,307.62. Harwood is in compliance. Culver set aside \$41,618.00 for professional development in 2006-2007 and expended \$4,215.38. Culver coded professional development expenditures to instruction. Therefore, they did not spend at least 10% for professional development. Culver is not in compliance.

Required Action: Because coding was not done correctly EVSC needs to establish stronger internal controls. EVSC must submit the plan for internal controls to the IDOE in writing by July 28, 2008. In addition, EVSC must carryover funds not spent during 2007-2008. Please refer to Attachment E taken from the Fiscal Handbook for more information on set-asides

Other Matters:

5 percent set-aside for Highly Qualified Staff: This has been addressed under Monitoring Topic 1.

Monitoring Topic 12: Compliance with Supplement, not Supplant

Background

IDOE interviewed the Title I Program Supervisor and corporation treasurer regarding the Title I supplement, not supplant requirements.

Statutory Requirement: Section 1120A requires Title I funds to supplement, not supplant non-Federal sources of funds.

Area of Compliance

Supplement, not Supplant: EVSC provided evidence that the schoolwide program expenditures were used to meet the statutory requirements for such programs and did not supplant non-federal resources.

LEA guidance: EVSC provided emails to school administrators regarding Title I services supplementing the general education program.

Monitoring Topic 13: Compliance with Financial Management Systems Requirements

Background

IDOE interviewed the Title I Program Supervisor and corporation treasurer regarding EVSC's financial management system.

Regulatory Requirement: Section 80.20 (b)-(i) of the Education Department General Administrative Regulations (EDGAR) details the threshold requirements financial management systems for non-State grantees (such as school districts).

Areas of Compliance

Purchasing: EVSC provided an understanding of the process of an expense going from the budget page to ordering and procurement. The Title I teacher completes a requisition and sends it to the Title I Program Supervisor. The Title I Program Supervisor approves the requisition. The materials are sent to the district where the item is labeled EVSC Title I and then sent to the school. The Title I Program Supervisor signs off on the purchase and the business office submits payment.

Expenditure Monitoring Systems: EVSC filed quarterly and final expenditure reports on time.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 13

Internal Control: EVSC is coding expenditures to incorrect accounts. For example, professional development is being coded to instruction.

Required Action: EVSC must ensure in writing to the IDOE by July 28, 2008 that expenditures are coded to the correct accounts. As addressed in Topic 11, EVSC needs to establish stronger internal controls. EVSC must submit the plan for internal controls to the IDOE in writing by July 28, 2008.

Expenditure Report: EVSC overspent in contracted services.

Required Action: EVSC must ensure in writing by July 28, 2008 to the IDOE that they will not overspend in future contracted services. Attachment F contains instructions for filing an amendment and moving 10% of a line item. Please refer

to Attachment F, taken from the Fiscal Handbook, to avoid overspending in the future.

Monitoring Topic 14 Compliance with compensation for personnel services requirements

Background

IDOE interviewed the Title I Program Supervisor, Chief Academic Officer as well as the principals of two schools in regard to the compensation for personnel services requirements.

Circular Requirement: OMB Circular A-87, Attachment B, Section 8 details the requirements for all compensation for personnel services supported with federal funds. This section includes the time distribution and semi-annual certification requirements.

Areas of Compliance:

Compensation for personnel services requirements: EVSC was able to provide evidence that personnel in "split-funded" positions (Title I and another source of funding) maintain Program Activity Reports (PAR)/Time and Effort logs. In addition, "Semi-Annual Certification" was completed as required.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 14

None

Monitoring Topic 15: Compliance with complaint procedures

Background

IDOE interviewed the Title I Program Supervisor and the Chief Academic Officer regarding the complaint process.

Areas of Compliance

Complaint Procedure Policy: EVSC has a complaint procedure policy; no complaints have been filed.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 15

None

Monitoring Topic 16: Compliance with equipment requirements – OMB A-87 and EDGAR 80.36

Background

IDOE interviewed the Title I Program Supervisor, corporation treasurer and two school principals regarding equipment acquired with Title I, Part A funds.

Regulatory Requirement: Section 80.36 of the Education Department General Administrative Regulations (EDGAR) details the threshold requirements for the use, management and disposition of equipment acquired with federal funds by non-State grantees (such as school districts).

Areas of Compliance

Disposition of Equipment: EVSC showed evidence of a disposition policy.

Title I Equipment: EVSC showed evidence that Title I equipment and technology was properly tagged.

Equipment and Technology Inventory: EVSC has inventory lists that meet the requirements of EDGAR 80.32.

Monitoring Topic 17: Compliance with Neglected Institutions: Funded through Title I, Part A

Background

IDOE interviewed the Title I Program Supervisor and Chief Academic Officer regarding compliance with neglected institutions.

Definition of facility: A public or private residential facility, other than a foster home, that is operated for the care of children who have been committed to the institution or voluntarily placed in the institution under applicable State law, due to abandonment, neglect, or death of their parents or guardian.

Areas of Compliance

Highly Qualified Staff: EVSC was able to provide evidence that individuals working within the neglected institution met the highly qualified requirements.

Implementation of Services and consultation: EVSC did provide evidence that meaningful and on-going consultation takes place with the neglected institution.

Attachment A

Local Educational Agency (LEA) Parental Involvement Policy: Sec. 1118 (a) (2)

Parental Involvement Policy Requirements:	Found on Page #
1. Involve parents in the joint development of the plan and the process of school review and improvement	Yes
2. Provide the coordination, technical assistance, and other support necessary to assist participating schools in planning and implementing effective parent involvement activities to improve student academic achievement and school performance	Yes
3. Build the schools' and parents' capacity for strong parental involvement by <ul style="list-style-type: none"> <input type="checkbox"/> Providing assistance to parents of children served as appropriate, in understanding such topics as the State's academic content standards and student academic achievement standards, and how to monitor a child's progress and work with educators to improve the achievement of their children <input type="checkbox"/> Providing materials and training to help parents to work with their children to improve their children's achievement, such as literacy training and using technology, as appropriate to foster parental involvement <input type="checkbox"/> Coordination and integrating parental involvement programs and activities with Head Start, Early Reading First, Even Start, the Home Instruction Programs for Preschool Youngsters, the Parents as Teachers Program, and public preschool and other programs and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children <input type="checkbox"/> Educate educators with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school <input type="checkbox"/> Ensure that information related to school and parent programs, meetings, and other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children <input type="checkbox"/> Other reasonable support for parental involvement activities under section 1118 as parents may request 	1. Yes 2. Yes 3. Yes 4. yes 5. Yes 6. Yes
4. Coordinate and integrate parental involvement strategies under Title I with strategies under other programs such as Head Start, Reading First, Early Reading First, Even Start, Parents as Teachers, and Home Instruction Program for Preschool Youngsters, and State-run preschool programs	Yes
5. Conduct, with the involvement of parents, an annual evaluation of the content and effectiveness of the parental involvement policy in improving the academic quality of the schools served under this part, including identifying barriers to greater participation by parents in activities (with particular attention to parents who are economically disadvantaged, are disabled, have limited English proficiency, have limited literacy, or are of any racial or ethnic minority background) and use the findings of such evaluation to design strategies for more effective parental involvement, and to revise, if necessary, the parental involvement policies	Yes
6. Involve parents in the activities of the schools served under Title I	Yes

Attachment B

School Parent Involvement Policy Checklist Culver Elementary School

Requirements of School Parental Involvement Policy	Culver
1. Convened an annual meeting at a convenient time, to which all parents of participating children shall be invited and encouraged to attend, to inform parents of their school's participation in Title I, Part A, and to explain the requirement of such and the right of the parents to be involved	Yes
2. Offered a flexible number of meetings, such as meetings in the morning or evening, and may provide, with funds provided under this part, transportation, child care, or home visits, as such services relate to parental involvement	Not found
3. Involve parents, in an organized, ongoing, and timely way, in the planning, review, and improvement of programs under this part, including the planning, review, and improvement of the school parental involvement policy	Yes
4. Provide parents with: <ul style="list-style-type: none"> <input type="checkbox"/> Provide timely information about Title I programs <input type="checkbox"/> A description and explanation of the curriculum in use at the school, the forms of academic assessment used to measure student progress, and the proficiency levels students are expected to meet <input type="checkbox"/> If requested by parents, opportunities for regular meetings to formulate suggestions and to participate, as appropriate, in decisions relating to the education of their children, and respond to any such suggestions as soon as practicably possible 	1. Yes 2. Not found 3. Not found
5. (SWP schools) If the schoolwide program plan under section 1114(b)(2) is not satisfactory to the parents of participating children, submit any parent comments on the plan when the school makes the plan available to the LEA	Not found
6. Includes a School-Parent Compact (see checklist next page)	Yes
7. Build the schools' and parents' capacity for strong parental involvement by: <ul style="list-style-type: none"> <input type="checkbox"/> Providing assistance to parents of children served as appropriate, in understanding such topics as the State's academic content standards and student academic achievement standards, and how to monitor a child's progress and work with educators to improve the achievement of their children <input type="checkbox"/> Providing materials and training to help parents work with their children to improve their children's achievement, such as literacy training and using technology, to foster parental involvement <input type="checkbox"/> Coordinating and integrating parent involvement programs and activities with Head Start, Early Reading First, Even Start, the Home Instruction Programs for Preschool Youngsters, the Parents as Teachers Program, and public preschool, and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children <input type="checkbox"/> Educate educators with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school <input type="checkbox"/> Ensure that information related to school and parent programs, meetings, and other activities, are sent to the parents of participating children in a format and, to the extent practicable, in a language the parents can understand <input type="checkbox"/> Other reasonable support for parental involvement activities as parents may request 	1. Yes 2. Yes 3. Yes 4. Yes 5. Yes 6. Yes

Requirements of School Parental Involvement Policy Harwood Middle School

1. Convened an annual meeting at a convenient time, to which all parents of participating children shall be invited and encouraged to attend, to inform parents of their school's participation in Title I, Part A, and to explain the requirement of such and the right of the parents to be involved	Yes
2. Offered a flexible number of meetings, such as meetings in the morning or evening, and may provide, with funds provided under this part, transportation, child care, or home visits, as such services relate to parental involvement	Yes
3. Involve parents, in an organized, ongoing, and timely way, in the planning, review, and improvement of programs under this part, including the planning, review, and improvement of the school parental involvement policy	Yes
4. Provide parents with: <ul style="list-style-type: none"> <input type="checkbox"/> Provide timely information about Title I programs <input type="checkbox"/> A description and explanation of the curriculum in use at the school, the forms of academic assessment used to measure student progress, and the proficiency levels students are expected to meet <input type="checkbox"/> If requested by parents, opportunities for regular meetings to formulate suggestions and to participate, as appropriate, in decisions relating to the education of their children, and respond to any such suggestions as soon as practicably possible 	1. Yes 2. Yes 3. Not found
5. (SWP schools) If the schoolwide program plan under section 1114(b)(2) is not satisfactory to the parents of participating children, submit any parent comments on the plan when the school makes the plan available to the LEA	Not found
6. Includes a School-Parent Compact (see checklist next page)	Yes
7. Build the schools' and parents' capacity for strong parental involvement by: <ul style="list-style-type: none"> <input type="checkbox"/> Providing assistance to parents of children served as appropriate, in understanding such topics as the State's academic content standards and student academic achievement standards, and how to monitor a child's progress and work with educators to improve the achievement of their children <input type="checkbox"/> Providing materials and training to help parents work with their children to improve their children's achievement, such as literacy training and using technology, to foster parental involvement <input type="checkbox"/> Coordinating and integrating parent involvement programs and activities with Head Start, Early Reading First, Even Start, the Home Instruction Programs for Preschool Youngsters, the Parents as Teachers Program, and public preschool, and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children <input type="checkbox"/> Educate educators with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school <input type="checkbox"/> Ensure that information related to school and parent programs, meetings, and other activities, are sent to the parents of participating children in a format and, to the extent practicable, in a language the parents can understand <input type="checkbox"/> Other reasonable support for parental involvement activities as parents may request 	1. Yes 2. Yes 3. Yes 4. Yes 5. Yes 6. Not found

Attachment C

School – Parent Compact Checklist

Culver Elementary School

School-Parent Compacts: As a component of the school-level parental involvement policy, each Title I school shall jointly develop with parents for all children served, a school-parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the State's high standards. Such compact shall:

School-Parent Compact shall include:	Found on Page #
1. Describe the school's responsibility to provide high-quality curriculum and instruction in a supportive and effective learning environment that enables the children served under this part to meet the State's student academic achievement standards, and the ways in which each parent will be responsible for supporting their children's learning, such as monitoring attendance, homework completion, and television watching; volunteering in their child's classroom; and participating, as appropriate, in decisions relating to the education of their children and positive use of extracurricular time; and	Not found (need to add wording for high-quality curriculum)
2. Address the importance of communication between teachers and parents on an ongoing basis through, at a minimum: <ul style="list-style-type: none"> <input type="checkbox"/> Parent-teacher conferences in elementary school, at least annually, during which the compact shall be discussed as the compact relates to the individual child's achievement <input type="checkbox"/> Frequent reports to parents on their children's progress <input type="checkbox"/> Reasonable access to staff, opportunities to volunteer and participate in their child's class, and observation of classroom activities 	1. Not found 2. Yes 3. Yes

Attachment C

School – Parent Compact Checklist

Harwood Middle School

School-Parent Compacts: As a component of the school-level parental involvement policy, each Title I school shall jointly develop with parents for all children served, a school-parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the State's high standards. Such compact shall:

School-Parent Compact shall include:	Found on Page #
1. Describe the school's responsibility to provide high-quality curriculum and instruction in a supportive and effective learning environment that enables the children served under this part to meet the State's student academic achievement standards, and the ways in which each parent will be responsible for supporting their children's learning, such as monitoring attendance, homework completion, and television watching; volunteering in their child's classroom; and participating, as appropriate, in decisions relating to the education of their children and positive use of extracurricular time; and	Not found (need to add wording for high-quality curriculum)
2. Address the importance of communication between teachers and parents on an ongoing basis through, at a minimum: <ul style="list-style-type: none"> <input type="checkbox"/> Parent-teacher conferences in elementary school, at least annually, during which the compact shall be discussed as the compact relates to the individual child's achievement <input type="checkbox"/> Frequent reports to parents on their children's progress <input type="checkbox"/> Reasonable access to staff, opportunities to volunteer and participate in their child's class, and observation of classroom activities 	1. Not found 2. Yes 3. Not found

Components of a Schoolwide Plan*: Harwood	
1. A comprehensive needs assessment of the whole school	YES
2. Implementation of schoolwide reform strategies that: <ul style="list-style-type: none"> ❑ Provide opportunities for all children to meet proficient and advanced levels of student academic achievement ❑ Use effective methods and instructional strategies that are based on scientifically based research that: <ul style="list-style-type: none"> ❑ Strengthens the core academic program ❑ Increases the amount of learning time ❑ Includes strategies for serving underserved populations ❑ Includes strategies to address the needs of all children in the school, but particularly low achieving children and those at risk of not meeting state standards ❑ Address how the school will determine if those needs of the children have been met ❑ Are consistent with and are designed to implement state and local improvement plans, if any 	YES
3. Highly qualified teachers in all core content area classes	NOT FOUND
4. High quality and on-going professional development for teachers, principals, and paraprofessionals	YES
5. Strategies to attract high-quality, highly qualified teachers to this school	NOT FOUND
6. Strategies to increase parental involvement, such as literary services	YES
6 a. Description how the school will provide individual academic assessment results to parents	YES
6 b. Strategies to involve parents in the planning, review, and improvement of the schoolwide plan	YES
7. Plans for assisting preschool children in the transition from early childhood programs such as Head Start, Even Start, Early Reading First, or a state-run preschool program	YES
8. Opportunities and expectations for teachers to be included in the decision making related to the use of academic assessment results leading to the improvement of student achievement	YES
9. Activities and programs at the school level to ensure that students having difficulty mastering proficient and advanced levels of the academic achievement are provided with effective, timely additional assistance	YES
10. Coordination and integration of federal, state and local funds; and resources such as in-kind services and program components	YES
10 a. A list of programs that will be consolidated under the schoolwide plan (if applicable)	N/A

**Title I Schoolwide Plan Checklist
John M. Culver Elementary (EVSC School Corp)**

Components of a Schoolwide Plan*:	
1. A comprehensive needs assessment of the whole school	YES
2. Implementation of schoolwide reform strategies that: <ul style="list-style-type: none"> <input type="checkbox"/> Provide opportunities for all children to meet proficient and advanced levels of student academic achievement <input type="checkbox"/> Use effective methods and instructional strategies that are based on scientifically based research that: <input type="checkbox"/> Strengthens the core academic program <input type="checkbox"/> Increases the amount of learning time <input type="checkbox"/> Includes strategies for serving underserved populations <input type="checkbox"/> Includes strategies to address the needs of all children in the school, but particularly low achieving children and those at risk of not meeting state standards <input type="checkbox"/> Address how the school will determine if those needs of the children have been met <input type="checkbox"/> Are consistent with and are designed to implement state and local improvement plans, if any 	YES
3. Highly qualified teachers in all core content area classes	Not Found Documentation Needed
4. High quality and on-going professional development for teachers, principals, and paraprofessionals	YES
5. Strategies to attract high-quality, highly qualified teachers to this school	YES
6. Strategies to increase parental involvement, such as literary services	YES
6 a. Description how the school will provide individual academic assessment results to parents	YES
6 b. Strategies to involve parents in the planning, review, and improvement of the schoolwide plan	YES
7. Plans for assisting preschool children in the transition from early childhood programs such as Head Start, Even Start, Early Reading First, or a state-run preschool program	YES
8. Opportunities and expectations for teachers to be included in the decision making related to the use of academic assessment results leading to the improvement of student achievement	YES
9. Activities and programs at the school level to ensure that students having difficulty mastering proficient and advanced levels of the academic achievement are provided with effective, timely additional assistance	YES
10. Coordination and integration of federal, state and local funds; and resources such as in-kind services and program components	N/A
10 a. A list of programs that will be consolidated under the schoolwide plan (if applicable)	N/A

Attachment E

(4) The required 10% professional development set-aside for schools in improvement must be expended within the fiscal year. Any dollars not expended within the fiscal year must be carried over and added into the district's professional development budget for the next fiscal year with additional professional development provided for the school (s) in improvement;

(5) The required 10% professional development set-aside for districts in improvement must be expended within the fiscal year. Any dollar not expended within the fiscal year must be carried over and added into the district's professional development budget for the next fiscal year.

Attachment F

MOVING 10% BETWEEN LINE ITEMS

A District is allowed to make a change of **no more than 10% difference** from one line item to another line item in the budget **once per program year** without submitting an amendment for approval.

AMENDMENT PROCEDURES

1. Determine why you need to file an amendment. Common reasons for filing an amendment are:
 - Your allocation increased or decreased and you need to adjust your budgets
 - Your original estimated costs for personnel, fixed charges, supplies, equipment, etc. was over/under the actual amount
 - Your program has changed since your original application and you need to make adjustments to program pages, personnel, costs, etc.
 - You may receive "reallocated funds." Reallocated funds become available as a result of districts declining Title I participation or excess carryover. payback funds for compliance related issues. Then, Office of Title I is responsible for reallocating such funds to Title I districts by using a poverty indicator that ranks those districts according to greatest need.
2. Include the following pages with all amendments, regardless of reason for amending, and even if no changes were made to these pages:
 - Cover letter
 - cover page (1)
 - set-aside pages (2-3)
 - equitable Share to Non Public Schools (4), **if any nonpublic schools are served**

- Eligible Schools Summary page (9)
- School Improvement page (17)
- Total Title I Budget (25)
- Cash Request page (26)

- Any other pages affected by the changes being made

Send a cover letter addressed to Lee Ann Kwiatkowski. This letter must contain

The reason for the amendment and enough explanation so that the reviewer can find changes reflected appropriately in the budgets and it is clear why changes were made.

3. Include additional revised pages if they apply – **some examples are:**

- Districtwide Administrative Expenses (5) - Your increase in allocation was minimal and will be used to increase the part-time clerical assistant to the Title I Program Supervisor.

- Off-the-Top Administrative Expenses (6) – you have a sizeable amount of money between the increase in final allocation and fixed charges being lower than expected and you want to put in a districtwide extended day kindergarten. Remember, this kind of change will warrant an equitable share to non public schools (page 4) if you have any.

- Off-the-Top Administrative Expenses (6) – you have an increase or decrease to the final allocation and need to adjust amounts for required set-asides such as choice/ses, professional development, and parental involvement.

- School Program Pages (10-15) – estimated costs were way over actual costs and your district received an increase in the final allocation – you decide to allocate this amount to the schools served. Their PPE would increase (page 9) and they would have to revise their budgets to reflect the increase at the school level. In addition, they would need to revise any of the program pages that are affected by the increase.

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No funds may be expended until **after** your amendment is approved – if money is expended prior to amendment approval, your general fund will be responsible for this amount. **No funds** may be used to reimburse any account prior to the date the amendment arrived at the IDOE.

Attachment G

M-4. What types of services may an LEA provide to homeless students with funds reserved under Section 1113(c)(3) of Title I?

An LEA may use funds reserved under this section to provide services to eligible homeless students in both Title I and non-Title I schools that are comparable to services provided to non-homeless students in Title I schools. Services provided should assist such children in meeting the State's challenging academic content and academic achievement standards.

An LEA has the discretion to use reserved funds to provide a homeless student with services that are not ordinarily provided to other Title I students and that are not available from other sources. For example, where appropriate, an LEA at its discretion may provide a student with an item of clothing to meet a school's dress or uniform requirement so that student may effectively take advantage of educational opportunities.